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Building The  
Wireless Future™

May 14, 1998

**CTIA**

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**RECEIVED**

**MAY 14 1998**

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Magalie R. Salas,  
Secretary  
Federal Communications Commission  
1919 M Street, NW Room 222  
Washington DC 20554

Re: Ex Parte Presentation  
CC Docket # 97-213 (Communications Assistance  
for Law Enforcement Act)

Dear Ms. Salas:

On Thursday, May 14, 1998, the Cellular Telecommunications Industry Association ("CTIA"), delivered a copy of the attached material, regarding the above-referenced proceeding, to the following:

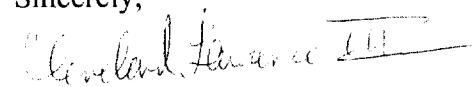
Peter Tenhula  
Richard Smith  
John Nakahata  
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Robert Pepper  
Ari Fitzgerald

Pursuant to Section 1.1206 of the Commission's Rules, an original and one copy of this letter and its attachments are being filed with your office. If you have any questions concerning this submission, please contact the undersigned.

Sincerely,

  
Cleveland Lawrence III

No. of Copies rec'd 0 & 1  
List A B C D E



# Telecommunications Industry Association Committee TR 45.2 ESS

MAUI, HI  
February 4, 1998

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**TITLE:** Enhanced Surveillance Services

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**SOURCES:** CTIA

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**DISTRIBUTION:** TR45.2, ESS

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**CONTACT:** Ed Hall, CTIA 202/736-3259

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**ABSTRACT:** This contribution identifies CTIA's enhanced surveillance services referred to as the "Punch List" that are considered "beyond" the scope of CALEA.

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**RECOMMENDATION:**

CTIA recommends that the enhanced services identified in this contribution be accepted for standardization. This list should not be considered as "mandatory requirements" by any government agency. federal, state or local law enforcement.

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## Enhanced Surveillance Services Beyond the Scope of CALEA

1. Background: During the TR45.2 December 1997 meeting, CTIA submitted a contribution (TR45.2/97.12.17.01) requesting that the features and services, as identified and discussed during the TR45.2 LAES Ad Hoc meetings, referred to as the "*Punch List*" be now considered for technical standards development within a newly defined TR45.2 Engineering Sub-Committee. CTIA further recommended certain stipulations impacting the scope of work. Law enforcement has expressed a strong desire for the additional capabilities identified on the "punch list" and, in response to this customer request, CTIA urges the industry to move forward to develop standards to meet law enforcement's needs assuming that law enforcement will be paying for such services in the future. Those conditions are listed below for clarification:
  - That *this* standards effort is *beyond* the scope of J-STD-025: J-STD-025 supports the requirements of CALEA. This particular effort reflects *Enhancements* in support of customer (LEA) requirements.
  - That this effort should in no way be considered an impediment to the immediate development and implementation of functionality and capabilities defined in J-STD-025.
  - That this standards effort is a logical evolution of technical standards and should be worked as previously agreed to, in a joint effort with T1, within TR45.2.
  - That "'Punch List'" items to be addressed/defined in this effort may be those that are deemed technically feasible and lawful.

The standards resulting from this effort would enable a set of features and services that could be offered to law enforcement on an "a la carte, pay per service basis". The standards would be in addition to but, completely separate from the industry's CALEA "safe harbor" standard J-STD-025 (or its ANSI replacement).

During August, 1997 the FBI provided industry with the following "*Punch List*". The list was submitted to DOJ as "capabilities missing from SP-3580A".

1. **Conference Calling I: Who is part of a call at all times**
2. **Conference Calling II: Party Hold and Party Join**
3. **Feature Keys**
4. **Network Signals**
5. **Timing**
6. **Status of Surveillance (Message)**
7. **Status of Surveillance (C-Tone)**
8. **Standard Delivery Interface**
9. **Feature Status Message**
10. **Dialing Information**
11. **Separated Call Content**

During a January 23, 1998 meeting between CTIA, other industry representatives, and the Department of Justice the FBI revealed that "*Separated Call Content*" and "*Standardized Physical Interface*" are no longer "*Punch List*" items. They further stated that they would no longer require "toggle switches" on any remaining "*Punch List*" items.

2. Proposed Work Plan: Based on the forgoing information CTIA submits the following list as the most current, agreed to "*Punch List*":

### **CTIA Punch List**

1. **Conference Calling I:**

Report the identities of the parties to a conversation at all times to the extent known to the switching system.

2. **Conference Calling II:**

Monitor a multi-party or conference call established by the intercept subject when two or more parties are allowed to converse after the intercept subject leaves the conversation.

3. **Feature Keys**

Report and identify intercept subject initiated signaling used to invoke or control features (e.g., feature keys or flash).

4. **Network Signals**

Report and identify network signaling applied toward the intercept subject where such signaling cannot be derived through examination of the delivered call content (e.g., power alerting, out-of-band tone commands).

5. **Improved Correlation**

Improve the correlation between communications delivered over CCCs and the call identifying information delivered over CDCs.

6. **CDC and Surveillance Status**

Periodically ensure each active CDC is operational.

Periodically report the active surveillance's for each CDC.

7. **Status of Surveillance (C-Tone)**

Periodically ensure each active CCC is operational.

8. **Feature Status Message**

Report changes at least once every 12 hours to the intercept subject's feature profile that may affect LEAs ability to obtain surveillance (e.g., activation's, deactivation's, programming of features or services)

9. **Dialing Information**

Report post cut-through digits when such digits are known not to control Customer Premises Equipment (CPE) (e.g., answering machines, voice mail services, PBXs, electronic key systems, electronic banking, voice response systems).

3. Scope:

- This list does not suggest nor does it recommend any prioritization of work for these services but rather remands that task to the FBI representative or to the body of the TR45.2 Ad Hoc.
- Since these are simply enhanced services to the capabilities established in J-STD-025 and will be requested as such by LE at the time of a lawful intercept, legal issues associated with some of these "*Punch List*" items should not be a consideration.

4. Concerns: Discussions between industry representatives, DOJ and Congress continue regarding Capability, Cost Recovery, Capacity and Compliance Date. CTIA will provide updated information on these topics as they may impact the proposed work of Enhanced Surveillance Services (ESS).